

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

FIRSTMERIT BANK, N.A.,)	
)	
Plaintiff,)	
)	
v.)	Case No. 13-cv-6047
)	
SUBURBAN IRON WORKS, INC. and)	Honorable Elaine E. Bucklo
MARK J. HIVON,)	
Defendants.)	

MOTION FOR ENTRY OF JUDGMENT OF FORECLOSURE

Plaintiff, FirstMerit Bank, N.A., by and through its attorney, Daniel I. Schlade of Arnstein & Lehr LLP, moves this court for entry of a Judgment of Foreclosure. In support thereof plaintiff states:

1. Concurrent with the filing of this Motion, plaintiff has filed a Motion For Summary Judgment against all defendants. Upon entry of a summary judgment order against all defendants, plaintiff is entitled to a judgment of foreclosure as well.

2. In further support of this Motion, plaintiff attaches and incorporates by reference its Affidavit of Proof, and its Affidavit of Attorney's Fees, attached hereto as Exhibits A and B.

2. A draft copy of the Judgment of Foreclosure is attached hereto as Exhibit C.

WHEREFORE, plaintiff FirstMerit Bank, N.A. respectfully requests that this Court enter the Judgment of Foreclosure and Sale.

FIRSTMERIT BANK, N.A.

s/Daniel I. Schlade
One of its Attorneys

Daniel I. Schlade (ARDC No. 6273008)
Arnstein & Lehr LLP
120 S. Riverside Plaza, Suite 1200
Chicago, Illinois 60606
(312) 876-7100

Certificate of Service

The undersigned, an attorney, upon oath, hereby certifies that he served a copy of the foregoing **Motion For Entry of Judgment of Foreclosure** upon all counsel of record, identified below, by causing a true and correct copy thereof to be delivered by electronically filing the document with the Clerk of Court using the ECF system on March 21, 2014.

Bert J. Zaczek
bert@bzlegal.net

James B. Zaczek
bert@bzlegal.net

s/Daniel I. Schlade _____
Attorney For Defendants